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NAS PENSACOLA  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON THE DRAFT FIFTH  
ANNUAL MONITORING FOR LONG TERM MONITORING AT OPERABLE UNIT 1 (OU 1) NAS  
PENSACOLA FL  
7/9/2007  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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July 9, 2007

Mr. Bill Hill  
OPG6  
NAVFACSOUTHEAST  
P.O. Box 190010  
North Charleston, South Carolina  
29419-9010

**RE: Draft 5<sup>th</sup> Annual Monitoring Report for Long-Term Monitoring Operable Unit 1, Naval Air Station Pensacola, Pensacola Florida.**

Dear Mr Hill:

The Department has completed the technical review of the above referenced document dated December 2006 (received December 6, 2006) with the following comments.

1. **General Comment:** A copy of the comments dated February 19, 2007, on the Optimization Study Report for Operable Unit 1 is attached to this letter. The concerns listed in this letter are the same concerns the Department has with this monitoring report. Please review the attached comments on the Optimization Study for OU 1 and the following comments for the subject document.
2. **General Comment , Page ES-3, SURFACE WATER- In this paragraph and throughout this document, Tetra Tech states that:**

*"Monitoring of iron levels in Wetland 3 surface water should be discontinued. Although concentrations of iron exceed the site specific surface water criteria of 2,360 ug/L, these concentrations appear to cause no unacceptable human or ecological risks. In the place of iron, surface water sampling for cadmium, and other metals should be implemented."*

The Department does not concur with removing iron from the surface water sampling in wetlands 3 or 4. However, the Department does agree with adding cadmium and other metals to the sampling regime. The Department commented on January 26, 2006, on the Remedial Investigation for Site 41, dated August 17, 2005. Site 41 includes all of the wetlands for Naval Air Station (NAS) Pensacola, including wetlands 3 and 4, located to the east of the OU 1 site. The following text is from the Department's comments dated January 26, 2006 on the Remedial Investigation for

Site 41, and the text specifically comments on wetlands 3 and 4:

***“Comment 1, Wetland 3:***

*Wetland 3 has been retained for a feasibility study. While we concur with this decision, there are a couple of points worth noting. First, toxicity tests were conducted using sediment and surface water sampled during Phase III. As indicated by the results of the sediment test, the laboratory control failed with respect to test organism emergence. Under optimum circumstances, these results would be discarded and the test repeated. Secondly, as a result of visiting the site, it is obvious that there is excessive iron contamination coating the sediments and vegetation of Wetland 3, extending through the culvert under the roadway and emptying into Wetland 4. The sediment and vegetation of Wetland 4 also exhibit iron contamination at the outfall of this culvert extending several yards into the wetland and along its banks. The interceptor trench installed in Wetland 3 to control landfill contamination was said to be still in operation. However, it is obvious that this trench is not sufficient to divert contamination from Wetland 3 and is not protective of Wetland 4. We recommend consideration of remediation methods for these two wetlands, as the contamination coming from the OU1 landfill appears to be constant and is not contained.*


3. **Page 1-5, Section 1.2.1, Surface Water Sampling:** The Department feels that additional surface water samples will need to be collected from Wetland 4b. Please see comment 5 of the attached comments from the Optimization Study for OU 1 for more details on this subject.
4. **Page 2-5, Section 2.3.3, Laboratory Analytical Results:** The Department feels that additional groundwater samples will need to be collected from the North side of Wetland 4. If these wells have been destroyed than they will need to be replaced for future groundwater monitoring. Please see comment 7 of the attached comments from the Optimization Study for OU 1 for more details on this subject.

Please address the preceding comments in either the Final 5<sup>th</sup> Annual Monitoring Report for OU 1 or the Final Optimization Study for OU 1 to be completed in the near future. If I can be any further assistance with this matter, please contact me at (850) 245-8998.

Sincerely,



Tracie L. Bolanos  
Remedial Project Manager

JJC  ESN 